

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LIBERTY MUTUAL INSURANCE
COMPANY,

Plaintiff,

v.

THE BLACK & DECKER
CORPORATION, BLACK & DECKER
INC., BLACK & DECKER (U.S.)
INC., EMHART CORPORATION,
and EMHART, INC.,

Defendants.

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)
) C.A. No. 96-10804-DPW
)
)

) Case No. 1:04-CV-10674-DPW
) (Old Southington Landfill Site)
)

) Case No. 1:04-CV-10678-DPW
) (Shaffer Landfill Site)
)
)

) Case No. 1:04-CV-10680-DPW
) (Solvents Recovery Service Site)
)

JOINT MOTION TO EXTEND TIME

Pursuant to Local Rule 7.1, plaintiff, Liberty Mutual Insurance Company ("Liberty Mutual"), and defendants, The Black & Decker Corporation, et al. ("Black & Decker"), hereby jointly move that the Court extend the periods for filing certain submissions, pursuant to the Court's September 23, 2004 Scheduling Order, as follows:

1. The due date for the parties' respective Motions for Summary Judgment regarding the Shaffer Landfill, Solvents Recovery Service, and Old Southington Landfill sites shall be extended to October 13, 2004. The oppositions to those motions will be due on November 17, 2004, and the reply memoranda concerning those motions will be due on December 6, 2004.

WHEREFORE, the parties respectfully request that the Court grant the extension requested in this motion, approving the due dates set forth above.

**LIBERTY MUTUAL
INSURANCE COMPANY**

By its attorneys,

/s/ Janice Kelley Rowan

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**THE BLACK & DECKER CORPORATION,
et al.**

By their attorneys,

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Dated: October 6, 2004

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